

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Profectus Technology LLC,

Plaintiff,

v.

Case No. 6:11-cv-00474-LED

**Huawei Technologies Co., Ltd.,
Huawei Technologies USA Inc.,
Huawei Device USA Inc.,
Futurewei Technologies, Inc.,
Dell Inc.,
Research In Motion Corporation,
Xplore Technologies Corp.,
Apple Inc.,
Parrot Inc.,
Samsung Telecommunications America, LLC,
Samsung Electronics America, Inc.,
Panasonic Corporation of North America,
Motion Computing, Inc.,
Flat Computing, LLC,
GiiNii International Corp., and
Eastman Kodak Company,**

Defendants.

Jury Trial Demanded

JOINT MOTION TO DISMISS WITH PREJUDICE

All claims and counterclaims asserted in this action by and between plaintiff Profectus Technology LLC and defendant GiiNii International Corporation have been settled and, pursuant to Fed. R. Civ. P. 41(a)(2), those parties hereby jointly move the Court to dismiss those claims and counterclaims with prejudice and with each party to bear its own costs, expenses, and attorneys' fees. This stipulated dismissal with prejudice is pursuant to plaintiff Profectus Technology LLC and defendant GiiNii International Corporation's settlement agreement entered in September of 2012.

Dated: September 25, 2012.

Respectfully submitted,

/s/ Steven E. Ross

Steven E. Ross
Lead Attorney
Texas State Bar No. 17305500
sross@rossipg.com

Samuel E. Joyner
Texas Bar No. 24036865
sjoyner@rossipg.com

ROSS IP GROUP PLLC
1700 Pacific Ave., Suite 3750
Dallas, Texas 75201
Phone: 972-661-9400
Facsimile: 972-661-9401

/s/ John V. Picone III

John V. Picone III
Lead Attorney
jpicone@hopkinscarley.com

HOPKINS & CARLEY
P.O. Box 1469
70 S First Street
Phone: 408-286-9800
Facsimile: 408-998-4790

**ATTORNEYS FOR DEFENDANT
GIINII INTERNATIONAL
CORPORATION**

Wesley Hill
Texas State Bar No. 24032294
wh@wsfirm.com

WARD & SMITH LAW FIRM
P.O. Box 1231
1127 Judson Rd., Ste. 220
Longview, Texas 75606-1231
Phone: 903-757-6400

**ATTORNEYS FOR PLAINTIFF
PROFECTUS TECHNOLOGY LLC**

CERTIFICATE OF SERVICE

In accordance with Federal Rule of Civil Procedure 5 and Local Rule CV-5(a), I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system on September 25, 2012.

/s/ Steven E. Ross

Steven E. Ross